

5/10/02

Brian Cutler (EA) Ozzy - DED
Rich Name Matt
Troy Charlton Macdonald

RCRA RECORDS CENTER
FACILITY MACDERMID
ID NO. CTD001164599
FILE LOC. A-13
OTHER RDMS# 100786

Jeff L. - (EA), Margaret Anish, Kim Clark

Troy -

Want to talk about CSM
- not yet received



RDMS DocID 00100786

Want to talk about closure

& a move to move forward w/ CA

Huntington-Cle - Chem refg op consolidated
in Fendall Michigan

↳ will o

Part B permit exp. in 1999, renewal submitted
to DEP & that time

op under exp. permit

Couple of units being closed - DED in stipulation
last fall

4 RCRA units - want to cl. w/ part B permit
submitted large RFA

(Want to continue CA under RCRA
(May believe State wants something more formal))

Ozzy - said other options incl. in. CA under revised permit

Troy - how have we dealt w/ other fac. like this

Matt - have not had a site like this

CA val until have a mechanism to formalizing

Troy - if wanted to withdraw permit & proceed under more - would this be acceptable

Matt - ch. in general - does permit need to mod for. admin Standpt.

Troy - don't need to mod -
Margaret - "^{believe}"

Matt - understood mod was being considered to use RSR - less stringent

Troy - NO

Matt - for short term, could continue on val basis, planning to stay

Troy - plan to hold on to prep. for some time

Ozzy - Stip judgment under AG office

so cl. under state oversight

Ozzy - does it make sense to cl. these other units

Troy -

Rick - timeline is only oversight

Troy - " basis in stip

Judgment - these 4 add units

Schedule agreed to as part of stip

Judgment - will be approved by DAP

Ozzy - WRT 4 units what is the fr. to w/draw app?

Troy - after cl. of units

Ozzy - could dispose of app by keeping cl. pl. in
frt if drop app. aspects

"continued in effect by timely removal app"

same app in effect (pending + not starting)
need to dispose of this

if w/draw app - no permit in effect
effect date of permit as written in permit

Tray - could cl. units then w/ draw

Ozzy - admin - could renew as should have done in 1999, but if were doing this now we should consider adding CA req.

Tray - ^{2 options} Eff. have permit renewed
or continue on Vol basis

¹³³⁴ Matt - or close under permit & do CA under State
or Fed order

Tray - want to avoid order, go Vol to
base reg. reg. for fac.

Jeff - other option could revoke or deny permit
^{& work w/ EPA}
do to cut things off

Ozzy - want to dev. a transition to state lead
work w/ EPA would not ~~interfere~~

Jeff - what about joint

Tray - Debarred fr. gov. contract
Adding consent order would make this worse

Try (cont.)

(3)

if not referring to MOU, state EPA has
other options

Ozzy - would feel most comfortable w/ permit

↳ would be enforceable & don't have to call it a
duck

Jeff - how long will it take
have to public notice

Ozzy - not sure what precludes McDonald fr.
moving forward w/ Clauses

Margaret - why does dept need a permit if we
have reg. (CA)

↳ how does they inc. CA w/out authority

Ozzy - do under their authority

Jeff - would EPA issue

↳ how well they discharge CA ob. w/ EPA

Matt - under state am right

↳ if state author cannot other state is authorize

Jeff - CA under State & still have an

CA obligation to EPA

have other sites where state says CA
done, if EPA does not agree

Want understanding that state ^{reg.} will satisfy EPA
more formal

Matt - regarding Pratt Moll

what diff in risk fr. varing under state permit
or EPA Moll -

Margaret - why do they even need a permit

Rick also questions - have been working voluntarily

w/me, why can't they keep moving along

Jeff - could they do CA under VCA w/ state

Ozzy wants to see this

133 X - how binding is VCA under this

State reg. - don't use in his program

~~if going to~~

Matt - does not want to go Moll route - for one

it's just as easy to go w/ consent agreement

(4)

Matt - Sun

Scope of CA

Troy - have submitted CSAs

Brian - " " approach to Stub -

Stub for each receptor

Screening & eval approach

ID gaps in data - will go out &
address

then achieve Stub - by Sept

PL - same time there after

Troy - indust area, FB area

Brian - primary receptor, in fur / surface soil
& limited due to pavement

anticipate setting ECR 1 or more - specific to
limit to indust activities

Zoo next Wed - meeting ^{with} Ozzy

3:00 Monday Matt & Ozzy will talk